

TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 99OPOT211

to be issued to:

ConocoPhillips Pipe Line Company - La Junta Terminal
Otero County
Source ID 0890007

Lisa Clarke
March – April 2008

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the renewal application submitted August 30, 2005, additional minor modification information submitted May 15, 2007 and July 19, 2007, similar operating permits, previous inspection reports, the original construction permits, as well as email communication with the applicant.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this Operating Permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This Operating Permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this Operating Permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. SOURCE DESCRIPTION:

This facility consists of petroleum marketing and storage terminal. Gasoline products, Kerosene Turbine Fuel (KTF) and diesel fuel are delivered by pipeline, stored and distributed by tanker trucks.

The facility emissions are associated with one (1) bottom loading tank truck rack, five (5) external floating roof fuel storage tanks, tank cleaning operations, fugitive equipment leaks and a propane drying train. Storage tanks producing insignificant levels of emissions include propane loading, two (2) fixed roof and two (2) external floating roof tanks dedicated to storage of KTF and Diesel fuel, five (5) fixed roof tanks for storage of fuel additives, one (1) fixed roof transmix tank, and three (3) fixed roof water/gas separator tanks. An internal combustion engine powers a pump to boost the pressure in the main pipeline that carries product (gasoline and distillates) to Denver.

Based on the information provided in the renewal application and additional documentation, the only changes to the significant emission units are adding the internal combustion engine and the propane drying train.

ConocoPhillips Pipeline (CPPL) requested that the insignificant activity list be updated, stating that the company removed four (4) additive tanks at the facility.

The loading rack (FLRACK) is equipped with a vapor combustion unit to control VOC and HAP emissions and has potential uncontrolled emissions of VOC over 100 tons/year. Therefore, the loading rack is subject to the compliance assurance monitoring (CAM) requirements.

The facility is located near La Junta, Colorado. The area in which the terminal operates is designated as attainment for all criteria pollutants. There are no affected states within 50 miles of the terminal. There are no Federal Class I designated areas within 100 kilometers of the terminal.

Please refer to the original Technical Review Document for a history of compliance issues pertaining to facility status and NSPS Subpart R. The facility is not affected the National Emissions Standards for Hazardous Air Pollutants, Gasoline Distribution Generally Available Control Technology regulation (40 CFR 63, Subpart BBBB) since it is already subject to the control requirements of 40 CFR Part 63, Subpart R (§§63.422, 63.423, and 63.424).

The summary of emissions that was presented in the Technical Review Document (TRD) for the original permit issuance has been modified to update the potential to emit (PTE) due to modifications made to the permitted emission units at this facility in the previous modifications, and changes due to new emission factors. Emissions (in tons per year) at the facility are as follows:

| POTENTIAL TO EMIT, TONS PER YEAR | | | |
|--|-----------------|-------------|-------------|
| | TONS PER YEAR | | |
| | NO _x | VOC | CO |
| Truck Loading Rack, Bottom Loading | 6.0 | 18.2 | 15.0 |
| Tanks LP-101, LJ-102, LJ-103, LS-202, LP-203 | | 42.7 | |
| Plant equipment leak fugitive VOC emissions | | 6.5 | |
| Tank cleaning | | 4.1 | |
| Propane Loading | | 1.9 | |
| Nordberg 600 HP Pump IC Engine | 19.8 | 0.7 | 81.5 |
| Oil/Water Separator | | 0.02 | |
| 17 tanks | | 4.65 | |
| Transmix sump | | 0.04 | |
| TOTALS | 55.8 | 86.9 | 96.5 |

| Actual Emissions for 2006 Data Year | | | |
|-------------------------------------|------|------|------|
| | 55.8 | 77.3 | 96.5 |

III. Discussion of Modifications Made

Source Requested Modifications

The source requested that the company name, responsible official, and company be updated to current information. An updated list of insignificant activities was also submitted. ConocoPhillips asked that the wording in Section II, Condition 1.5 be changed to use a Method 22 observation for visible emissions, rather than a Method 9, which is sufficient, since the unit in question is a VCU and only expected to emit VOC emissions. The source submitted a CAM plan identical to the CAM plan in effect at the ConocoPhillips Denver Terminal that the Division previously developed.

The Division received two minor modifications requests in relation to this permit after the renewal application submittal. On May 15, 2007, ConocoPhillips requested that Section II, Condition 4 be revised to allow for cleaning four (4) tanks per year and an increase in emissions of 1.03 tons per year to account for the extra tank cleaning. ConocoPhillips also obtained Colorado Construction Permit 05OT0889 for a propane drying train that became operational on July 20, 2006. On July 19, 2007, the Division received a minor modification for the Operating Permit to incorporate the drying train into the permit.

ConocoPhillips notified the Division on June 9, 2008 that the facility is no longer subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act. The documentation is in the Title V files under Miscellaneous (dated June 17, 2007).

Other Modifications

The Division has included changes to make the permit more consistent with recently issued permits, included comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

The Division has made the follow revisions, based on recent internal permit processing decisions and EPA comments. These changes are as follows:

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- Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on the permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

- Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

Section I – General Activities and Summary

- Condition 1.1 is revised to update the source description.
- Condition 1.4 is modified to reflect current state-only enforceable conditions.
- Condition 1.5 is updated to include the engine and propane drying train.

Section II – Specific Permit Terms

- Language is added to all relevant conditions requiring records to be maintained for Division review upon request.

Section II.1: S010 - Truck Loading Rack With Vapor Control Unit

- Table 1 is revised to reflect current conditions.
- Condition 1.1 now details the calculated emissions.
- Condition 1.2 has been added to identify maximum loadout rate recording and limitations.
- Condition 1.3 (previously condition 1.2) is revised to update Subpart R conditions for clarification purposes.
- Condition 1.6 (previously condition 1.5) is changed to update method and permit language to reflect recently issued permits.
- Condition 1.7 was deleted since condition 1.4 now covers this information.
- Condition 1.9 was deleted since the performance test has been completed and approved by the Division.
- A new Condition 1.7 has been inserted to account for the requirements of 40 CFR 60, Subpart A General Provisions.
- A new Condition 1.9 has been added for the applicable CAM Plan.

Section II.2: S011 – Gasoline/KTF/Diesel Storage Tank

- Tables 2 and 2.1 have been updated to reflect current conditions.
- Condition 2.1 was deleted since Table 2.1 now suffices for this condition.
- Condition 2.1 (previously 2.2) is revised to include a twelve-month rolling total and language is updated to reflect recently issued permits.
- Condition 2.2 was changed from condition 2.3.
- Condition 2.3 was changed from condition 2.4.
- Condition 2.5 for opacity was deleted since this unit only emits VOC emissions.

Section II.3: S012 – Fugitive VOC Emissions from Equipment Leaks

- Table 3 has been updated to reflect current conditions.
- The emission factors, and subsequently the emissions, have been updated to reflect the most recent APEN submitted, which updated the component counts at the facility.
- Condition 3.1 for opacity was deleted since this unit only emits VOC emissions.

- Condition 3.2 was deleted since this condition is now incorporated into another condition (now condition 3.1).
- Condition 3.1 (previously 3.3) is revised to reflect recently issued permit language.

Section II.4: S013 – Tank Cleaning Activities

- Table 4 has been updated to reflect current conditions.
- Condition 4.1 was deleted since this unit only emits VOC emissions.
- Condition 4.1 (previously condition 4.2) is revised to reflect language in recently issued permits.

Section II.5: S006 – 600 HP Nordberg NG-Fired Engine

- This section has been added since this unit is an APEN-required source, although it is still grandfathered.
- Condition 5.1 requires emissions to be calculated as approved by the Division.
- Condition 5.2 is the opacity requirement for engines.
- Condition 5.3 requires the engine to be operated and maintained correctly.

Section II.6: S015 – Propane Dryer Train and Portable Flare

- This section has been incorporated into the permit since a year has passed since the dryer train has gone into operation (Construction Permit 05OT0889).
- Condition 6.1 states that emissions be calculated as approved by the Division.
- Condition 6.2 requires tracking, and also includes limitations, on maintenance events on the propane drying train.
- Condition 6.3 compels tracking of portable flare emissions when the flare is on-site and used during maintenance events.
- Condition 6.4 requires that the portable drying train comply with most recent Division approved operation and maintenance plan.

Section II.6: Emissions Compliance – deleted due to repetition.

Section II.7: Compliance Assurance Monitoring

- This section has been added to include the compliance assurance monitoring requirements for the vapor control system installed on the truck loading rack at the facility.

Section II.8: Disposal of Volatile Organic Compounds (previously Section II.7)

Section II.8: Colorado Regulation No. 8 – deleted due to repetition.

Section II.9: Colorado Regulation No. 2 – deleted due to repetition.

Section III: Permit Shield: This section has been updated to remove any obvious non-applicable requirements and also for clarification purposes.

Appendix A: The insignificant activity list has been updated per the source's request.

Appendices B, C, and D: Language has been updated to reflect recently issued permits.

Appendix G has been deleted due to repetition.